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Including Professional Corporations
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Attorneys for Defendant.
CHEVRON U.S.A. INC.,
a Pennsylvania corporation

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF TRACEY A.
KENNEDY IN SUPPORT OF
DEFENDANT CHEVRON U.S.A. INC.’S
RENEWED MOTION FOR
JUDGMENT AS A MATTER OF LAW
PURSUANT TO FED. R. CIV. P. 50(b),
OR IN THE ALTERNATIVE, MOTION
FOR NEW TRIAL AND/OR
REMITTITUR**

*[Filed concurrently with Notice of Motion;
Memorandum of Points and Authorities;
and [Proposed] Order]*

Date: October 30, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – Fifth Floor

District Judge: Hon. Hernán De. Vera

Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023

Trial Date: August 19, 2025

DECLARATION OF TRACEY A. KENNEDY

I, Tracey A. Kennedy, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron U.S.A. Inc., a Pennsylvania corporation (“Defendant”). I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts of the Reporter’s Transcript of Partial Jury Trial Proceedings, dated August 19, 2025, the first day of trial in this case.

3. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts of the Reporter’s Transcript of Jury Trial Proceedings, dated August 20, 2025, the second day of trial in this case.

4. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts of the Reporter’s Transcript of Jury Trial Proceedings, dated August 21, 2025, the third day of trial in this case.

5. Attached hereto as **Exhibit D** is a true and correct copy of relevant excerpts of the Reporter’s Transcript of Jury Trial Proceedings, dated August 22, 2025, the fourth day of trial in this case.

6. True and correct copies of all cited Trial Exhibits are attached hereto and admitted by the Court as stated:

Trial Exhibit 16, “Job Description: NMA EGTL Reliability Engineering Manager – 5/7/19 (Snookal-01157-58),” admitted into evidence on August 21, 2025.

Trial Exhibit 20, “Assignment Offer Letter – 7/1/19 (Snookal-00647-650),” admitted into evidence on August 21, 2025.

Trial Exhibit 33, “Dr. Khan’s letter – 7/29/19 re Snookal condition (Snookal-00665),” admitted into evidence on August 19, 2025.

Trial Exhibit 39, “Email thread between Olorunfemi Pitan, Victor Adeyeye, Eshiofe Asekomeh and Henry Aiwuyo re Mark Snookal Medical Report – 7/30/19-8/15/19 (CUSA0001426-1429; 1486-1507; 1522-1525; 1528-1532),” admitted into evidence on August 20, 2025.

Trial Exhibit 54, “Expatriate Exam Recommendations – 8/15/19 (Snookal-01099),” admitted into evidence on August 19, 2025.

Trial Exhibit 68, “Email string between Dr. Levy and Dr. Kahn [sic] – 8/23 and 8/26/19 re Patient MS (CUSA000557-558),” admitted into evidence on August 19, 2025.

Trial Exhibit 69, “Email thread btwn Dr. Levy and Dr. Arenyeka re: Patient MS 8/26/19 (CUSA000995-997),” admitted into evidence on August 20, 2025.

Trial Exhibit 76, “Email from Andrew Powers re: the Rescinded Job Offer in Nigeria – 9/4/19,” admitted into evidence on August 20, 2025.

Trial Exhibit 88, “Email from Dr. Levy to Snookal re: medical – 9/16/19 (Snookal-00645-646, CUSA000559-560),” admitted into evidence on August 20, 2025.

Trial Exhibit 127, “Location Premiums by Area of Assignment (CUSA000501-502),” admitted into evidence on August 22, 2025.

Trial Exhibit 148, “Dr. Charles Baum Report and Documents relied upon,” admitted into evidence on August 20, 2025.

Trial Exhibit 154, “Expert Report and CV of Chen Song, Ph.D.,” admitted into evidence on August 22, 2025.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this Declaration was executed on September 30, 2025, at Los Angeles, California.

/s/ Tracey A. Kennedy

TRACEY A. KENNEDY